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Co-Lead Counsel for Plaintiffs

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UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA
SOUTHERN DIVISION

DANIEL TUROCY, et al., Individually
and on Behalf of All Others Similarly
Situating,

Plaintiffs,

vs.

EL POLLO LOCO HOLDINGS, INC.,
et al.,

Defendants.

Case No. 8:15-cv-01343-DOC-KES
(**Consolidated**)

CLASS ACTION

PLAINTIFFS' NOTICE OF MOTION
AND MOTION FOR FINAL
APPROVAL OF CLASS ACTION
SETTLEMENT AND APPROVAL OF
PLAN OF ALLOCATION

DATE: August 21, 2019
TIME: 8:30 a.m.
CTRM: 9D
JUDGE: Honorable David O. Carter

1 TO: ALL PARTIES AND THEIR RESPECTIVE COUNSEL OF RECORD

2 PLEASE TAKE NOTICE that on August 21, 2019, at 8:30 a.m., or as soon
 3 thereafter as counsel may be heard, in the Courtroom of the Honorable David O.
 4 Carter, United States District Judge, at the United States District Court for the Central
 5 District of California, Courtroom 9D of the United States Courthouse, 411 West
 6 Fourth Street, Santa Ana, California 92701, Plaintiffs, by and through their counsel,
 7 will respectfully move, pursuant to Federal Rule of Civil Procedure 23(e), for entry of
 8 the [Proposed] Final Judgment and Order of Dismissal with Prejudice and the
 9 [Proposed] Order Approving the Plan of Allocation.¹

10 Plaintiffs' motion is based on the Memorandum of Points and Authorities in
 11 Support thereof; the Joint Declaration of Laurence M. Rosen and Ryan A. Llorens in
 12 Support of Motions for: (1) Final Approval of Class Action Settlement and Approval of
 13 Plan of Allocation; and (2) an Award of Attorneys' Fees and Expenses and Awards to
 14 Lead Plaintiffs Pursuant to 15 U.S.C. §78u-4(a)(4); the Declarations of Lead Plaintiffs;
 15 the Declaration of Carole K. Sylvester Regarding Notice Dissemination, Publication,
 16 and Requests for Exclusion Received to Date; the Stipulation of Settlement dated
 17 April 3, 2019 (ECF No. 187); all of the prior pleadings and papers in this Litigation;
 18 and such additional evidence or argument as may be required by the Court.

19 DATED: July 17, 2019

Respectfully submitted,

20 ROBBINS GELLER RUDMAN
 21 & DOWD LLP
 22 RYAN A. LLORENS
 LAURIE L. LARGENT
 KEVIN A. LAVELLE

23 *s/Ryan A. Llorens*

24 RYAN A. LLORENS

25
 26
 27
 28 ¹ Lead Counsel will submit proposed orders to the Court, along with their reply
 submission, on or before August 14, 2019.

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4 All other signatories listed, and on whose
5 behalf the filing is submitted, concur in the
6 filing's content and have authorized the
filing.

7 THE ROSEN LAW FIRM, P.A.
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9 *s/Laurence M. Rosen*

10

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CERTIFICATE OF SERVICE

I hereby certify under penalty of perjury that on July 17, 2019, I authorized the electronic filing of the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the e-mail addresses on the attached Electronic Mail Notice List, and I hereby certify that I caused the mailing of the foregoing via the United States Postal Service to the non-CM/ECF participants indicated on the attached Manual Notice List.

s/ Ryan A. Llorens
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Mailing Information for a Case 8:15-cv-01343-DOC-KES Daniel Turocy v. El Pollo Loco Holdings, Inc. et al

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Manual Notice List

The following is the list of attorneys who are **not** on the list to receive e-mail notices for this case (who therefore require manual noticing). You may wish to use your mouse to select and copy this list into your word processing program in order to create notices or labels for these recipients.

- (No manual recipients)